

FILED

MAR 19 2021

PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC  
BY 24 DEP CLK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

NO. 5:19-MJ-1036-BO

NO. 5:19-MJ-1037-BO

IN RE GRAND JURY SUBPOENAS )  
)  
) THE UNITED STATES' NOTICE OF  
) PROPOSED REDACTIONS  
)  
) (UNDER SEAL)  
)

Pursuant to the Court's March 9, 2021 order, the United States of America, by and through the Acting United States Attorney for the Eastern District of North Carolina, hereby notifies the Court of the documents that the United States proposes redacting before they are unsealed. Contemporaneously with and as attachments to this notice, the United States is filing redacted copies of the documents identified below (together with any exhibits that were originally filed with each document). The United States respectfully requests that the original, unredacted versions of these documents remain sealed at this time.

As indicated in the United States' motion to unseal, the State of North Carolina has requested an opportunity to respond to the United States' proposed redactions before the Court rules on them. The United States is serving this notice on the State, along with the redacted versions of the documents listed below, consistent with the certificate of service appended to this filing.

ATT. NO.	DOCUMENT	DATE FILED	REASON FOR REDACTION
1	United States' Response in Opposition to the Motion of the North Carolina Board of Elections to Quash Respondent's Subpoena	Jan. 15, 2019	<p><b>Page 3 n.4</b> – The referenced information concerns unrelated investigative activity.</p> <p><b>Page 12 n.18</b> – The referenced information concerns unrelated investigative activity.</p> <p><b>Exhibit List</b> – The referenced information concerns unrelated investigative activity.</p> <p><b>Gov't Ex. A</b> – The referenced document concerns unrelated investigative activity.</p> <p><b>Gov't Ex. B</b> – The referenced information is personal identifiable voter data.</p> <p><b>Gov't Ex. C</b> – The referenced information is personal identifiable voter data.</p>
2	United States' Response in Opposition to the Motion of the North Carolina Division of Motor Vehicles to Quash Respondent's Subpoena	Jan. 15, 2019	<p><b>Page 2 n.2</b> – The referenced information concerns unrelated investigative activity.</p> <p><b>Exhibit List</b> – The referenced information concerns unrelated investigative activity.</p> <p><b>Gov't Ex. A</b> – The referenced document concerns unrelated investigative activity.</p> <p><b>Gov't Ex. B</b> – The referenced information is personal identifiable voter data.</p> <p><b>Gov't Ex. C</b> – The referenced information is personal identifiable voter data.</p>

ATT. NO.	DOCUMENT	DATE FILED	REASON FOR REDACTION
3	United States' Memorandum in Support of Its Motion for a Non-Disclosure Order	Feb. 11, 2019	<b>Page 17 n.16</b> – The referenced information concerns unrelated investigative activity.
4	United States' Memorandum in Support of Its Unopposed Motion for a Non-Disclosure Order	Dec. 5, 2019	<b>Page 9 n.9</b> – The referenced document remains sealed before another court in this District.
5	United States' Response in Opposition to the Media's Motion for Leave to Move to Intervene	Apr. 13, 2020	<p><b>Page 8 n.8</b> – The referenced matter remains sealed before another court in this District.</p> <p><b>Page 9 &amp; n.10</b> – The referenced information concerns investigative activity in other districts.</p> <p><b>Page 11 n.11</b> – The referenced document remains sealed before another court in this District.</p>
6	United States' Response in Opposition to the Media's Motion to Intervene	May 7, 2020	<p><b>Page 7 n.10</b> – The referenced matter remains sealed before another court in this District.</p> <p><b>Page 8</b> – The referenced information concerns investigative activity in another district.</p> <p><b>Page 10 n.12</b> – The referenced document remains sealed before another court in this District.</p>
7	United States' Memorandum in Support of Its Unopposed Motion to Extend a Non-Disclosure Order	May 27, 2020	<p><b>Page 2</b> – The referenced information relates to on-going investigative activity.</p> <p><b>Page 9 n.9</b> – The referenced matter remains sealed before another court in this District.</p> <p><b>Page 10</b> – The referenced information relates to on-going investigative activity.</p>

ATT. NO.	DOCUMENT	DATE FILED	REASON FOR REDACTION
			<p><b>Page 11</b> – The referenced information concerns investigative activity in another district.</p> <p><b>Page 13 n.10</b> – The referenced document remains sealed before another court in this District.</p>
8	United States' Response in Opposition to the Media's Second Motion for Leave to Intervene and Motion to Unseal	June 23, 2020	<p><b>Page 8</b> – The referenced information relates to on-going investigative activity.</p> <p><b>Page 8 n.11</b> – The referenced matter remains sealed before another court in this District.</p> <p><b>Page 9</b> – The referenced information relates to on-going investigative activity.</p> <p><b>Page 10</b> – The referenced information concerns investigative activity in another district.</p> <p><b>Page 12 n.12</b> – The referenced document remains sealed before another court in this District.</p>
9	United States' Memorandum in Support of Its Second Unopposed Motion to Extend a Non-Disclosure Order	Nov. 23, 2020	<p><b>Page 5</b> – The referenced document remains sealed by order of the United States Court of Appeals for the Fourth Circuit.<sup>1</sup></p> <p><b>Page 10 n.9</b> – The referenced matters remain sealed before other courts in this District.</p>

<sup>1</sup> After this Court's docket and filings are unsealed, the United States anticipates moving to unseal certain filings in *In re Capitol Broadcasting Co., Inc.*, Nos. 20-1651, 20-1652 (4th Cir.). At this time, however, the United States must comply with the Fourth Circuit's sealing order. *See id.*, [D.E. 28] (4th Cir. Aug. 25, 2020).

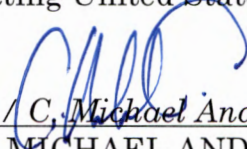


ATT. NO.	DOCUMENT	DATE FILED	REASON FOR REDACTION
			<p><b>Pages 10-11</b> – The referenced information relates to cooperators and to on-going investigative activity.</p> <p><b>Page 16</b> – The referenced information and document remain sealed by order of the United States Court of Appeals for the Fourth Circuit.</p> <p><b>Page 21</b> – The referenced information and document remain sealed by order of the United States Court of Appeals for the Fourth Circuit.</p> <p><b>Page 22 n.13</b> – The referenced information relates to on-going investigative activity.</p> <p><b>Page 24</b> – The referenced document remains sealed by order of the United States Court of Appeals for the Fourth Circuit.</p>
10	United States' Unopposed Motion to Lift Non-Disclosure Order	Feb. 23, 2021	<p><b>Page 5</b> – The referenced document remains sealed by order of the United States Court of Appeals for the Fourth Circuit.</p>
11	United States' Memorandum in Support of Its Unopposed Motion to Lift Seal and for Authority to Disclose Certain Grand Jury Material	Feb. 26, 2021	<p><b>Page 7</b> – The referenced document remains sealed by order of the United States Court of Appeals for the Fourth Circuit.</p> <p><b>Page 8</b> – The referenced information remains sealed by order of the United States Court of Appeals for the Fourth Circuit.</p> <p><b>Page 12</b> – The referenced document and information remain</p>

ATT. NO.	DOCUMENT	DATE FILED	REASON FOR REDACTION
			<p>sealed by order of the United States Court of Appeals for the Fourth Circuit.</p> <p><b>Page 13</b> – The referenced document and information remain sealed by order of the United States Court of Appeals for the Fourth Circuit.</p> <p><b>Att. 1, at 7</b> – The referenced matter remains sealed before another court in this District.</p> <p><b>Att. 1, at 13</b> – The referenced matter remains sealed before another court in this District.</p> <p><b>Att. 1, at 21</b> – The referenced information relates to on-going investigative activity.</p>

Respectfully submitted this 19th day of March, 2021.

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### CERTIFICATE OF SERVICE

I do hereby certify that on this 19th day of March, 2021, I have served a copy of the foregoing sealed document, together with its attachments, on the parties below, by depositing a copy with the United States Postal Service, addressed as follows:

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